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**From:** Schrier, Michael

**Sent:** Sunday, March 12, 2023 12:22 PM

**To:** Shelton, Joseph <jshelton@fisherphillips.com>; Hibler, Tyler <Tyler.Hibler@huschblackwell.com>

**Cc:** Scheiderer, Megan <Megan.Scheiderer@huschblackwell.com>

**Subject:** RE: Maxim v. Charles; Depositions of SnapNurse and Jamie Barber

Joe,

A pleasure to meet you. I am in receipt of your objections.

Two points:

1. I would like to schedule a telephonic “meet and confer” with you for tomorrow afternoon at 4 pm ET so that you and I can introduce ourselves, dig into the objections you have raised, and see if there are any last minute ways to resolve this discovery dispute short of motions practice. In the event we cannot find any such mutually acceptable resolution, we need to speak tomorrow so that you and I fully comply with NDGa LR 37.1(A)(1) prior to Maxim engaging in any potential motions practice prior to the scheduled deposition dates; and
2. Please confirm the intent and scope of your March 10, 2023 correspondence. I read your letter as objecting to both the document production and deposition aspects of the subpoenas served on SnapNurse and Ms. Barber (for both of whom you have accepted service). Please confirm the following as soon as possible, but no later than noon ET on Monday March 13, 2023 – **is it SnapNurse’s and Ms. Barbers intention to refuse to produce any documents AND to refuse to appear at any FRCP 45 depositions absent a court order resolving the objections you served on Friday?**

I look forward to speaking with you tomorrow so that I may thereafter make appropriate travel plans to come to Atlanta to take depositions this week and/or appear before the Court for motions practice.

Michael

**Michael Schrier**  
**Partner**

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**From:** Shelton, Joseph <[jshelton@fisherphillips.com](mailto:jshelton@fisherphillips.com)>

**Sent:** Friday, March 10, 2023 5:21 PM

**To:** Hibler, Tyler <[Tyler.Hibler@huschblackwell.com](mailto:Tyler.Hibler@huschblackwell.com)>; Schrier, Michael <[Michael.Schrier@huschblackwell.com](mailto:Michael.Schrier@huschblackwell.com)>

**Cc:** Scheiderer, Megan <[Megan.Scheiderer@huschblackwell.com](mailto:Megan.Scheiderer@huschblackwell.com)>

**Subject:** RE: Maxim v. Charles; Depositions of SnapNurse and Jamie Barber

[EXTERNAL EMAIL]

Tyler and Michael,

Please see the attached Objections to the third party discovery requests.

As noted in the Objections, I am willing to continue dialogue with you regarding the pending issues.

Thanks,

Joe



**Joseph P. Shelton**  
Regional Managing Partner

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\*\* We have moved. Please note new address above.

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**From:** Hibler, Tyler <[Tyler.Hibler@huschblackwell.com](mailto:Tyler.Hibler@huschblackwell.com)>

**Sent:** Thursday, March 9, 2023 2:49 PM

**To:** Shelton, Joseph <[jshelton@fisherphillips.com](mailto:jshelton@fisherphillips.com)>

**Cc:** Schrier, Michael <[Michael.Schrier@huschblackwell.com](mailto:Michael.Schrier@huschblackwell.com)>; Scheiderer, Megan <[Megan.Scheiderer@huschblackwell.com](mailto:Megan.Scheiderer@huschblackwell.com)>

**Subject:** Maxim v. Charles; Depositions of SnapNurse and Jamie Barber

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Mr. Shelton,

Please see the attached letter and corresponding exhibits provided in response to your March 3, 2023 letter. I am available to confer with you regarding the upcoming depositions and the electronic searches referenced within this letter tomorrow after 9:30 a.m. CST.

Included on this email is Michael Schrier, a partner out of our firm's Washington D.C. office. Mr. Schrier will be conducting the 30(b) (6) deposition and the deposition of Ms. Barber on March 15th and 16th. I will be out of office between March 11th and March 18th. You may contact Mr. Schrier directly if you have questions or concerns related to this matter during that period.

Mr. Schrier's contact information is as follows:

**Michael Schrier**  
**Partner**

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Thank you,

**Tyler Hibler**  
**Partner**

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